

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
:  
KAMILAH BROCK, :  
:  
Plaintiff, :  
:  
-v- :  
:  
:  
ELISABETH LESCOUFLAIR, et al., :  
:  
Defendants. :  
-----X

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VERDICT SHEET #2

15-cv-1832 (VSB)

**Question 1:**

Has the Plaintiff, Kamilah Brock, demonstrated, by a preponderance of the evidence, that she was subjected to unlawful detention on September 13, 2014 or on any of the days thereafter until September 22, 2014:

- a. by Dr. Elisabeth Lescouflair?  
Yes \_\_\_\_\_ No ☒
- b. by Dr. Zana Dobroschi?  
Yes \_\_\_\_\_ No ☒
- c. by Dr. Alan Dudley Labor?  
Yes \_\_\_\_\_ No ☒
- d. by Dr. Herman Anderson?  
Yes \_\_\_\_\_ No ☒
- e. by Police Officer Salvador Diaz?  
Yes \_\_\_\_\_ No ☒

**Proceed to Question 2.**

**Question 2:**

Has the Plaintiff, Kamilah Brock, demonstrated, by a preponderance of the evidence, that she was subjected to a violation of her due process rights:

- a. by Dr. Elisabeth Lescouflair?  
Yes \_\_\_\_\_ No ✓
- b. by Dr. Zana Dobroschi?  
Yes \_\_\_\_\_ No ✓
- c. by Dr. Alan Dudley Labor?  
Yes \_\_\_\_\_ No ✓
- d. by Dr. Herman Anderson?  
Yes \_\_\_\_\_ No ✓

If you answered "No" to *all* of the above nine questions, please proceed to the signature line below.

If you answered "Yes" to any of the above five subparts of Question 1, please proceed to Question 3(a).

If you answered "No" to all of the above five subparts of Question 1, but answered "Yes" to any of the above four subparts of Question 2, please proceed to Question 5(a).

**Question 3(a):**

Has Plaintiff demonstrated, by a preponderance of the evidence, that she suffered compensatory damages as a result of being subjected to unlawful detention by any or all of the Defendants?

Yes \_\_\_\_\_ No \_\_\_\_\_

If you answered "No", please proceed to Question 3(b).

If you answered "Yes", please proceed to Question 3(c).

**Question 3(b):**

What amount of nominal damages, not to exceed one dollar, do you award Plaintiff on her unlawful detention claim?

\$ \_\_\_\_\_

**Please proceed to Question 4.**

**Question 3(c):**

State the total dollar amount of the compensatory damages that you find Plaintiff is entitled to for being subjected to unlawful detention, including the specific amount attributable to each Defendant to which you answered "Yes" in Question 1 above:

Amount attributable to conduct of Dr. Elisabeth Lescouflair: \$ \_\_\_\_\_

Amount attributable to conduct of Dr. Zana Dobroski: \$ \_\_\_\_\_

Amount attributable to conduct of Dr. Alan Dudley Labor: \$ \_\_\_\_\_

Amount attributable to conduct of Dr. Herman Anderson: \$ \_\_\_\_\_

Amount attributable to conduct of Officer Salvador Diaz: \$ \_\_\_\_\_

Total: \$ \_\_\_\_\_

**Please proceed to Question 4.**

**Question 4:**

Has Plaintiff demonstrated, by a preponderance of the evidence, that she suffered punitive damages as a result of being subjected to unlawful detention?

Yes \_\_\_\_\_ No \_\_\_\_\_

**If you answered "No", and you answered "No" to all of the four subparts in Question 2, please proceed to the signature line below**

**If you answered "No", and you answered "Yes" to any of the four subparts in Question 2, please proceed to Question 5(a).**

**If you answered "Yes", please proceed to Question 4(a).**

**Question 4(a)**

State the total dollar amount of the punitive damages that you find Plaintiff is entitled to for being subjected to unlawful detention, including the specific amount attributable to each Defendant to which you answered "Yes" in Question 1 above:

Amount attributable to conduct of Dr. Elisabeth Lescouflair: \$ \_\_\_\_\_

Amount attributable to conduct of Dr. Zana Dobroshi: \$ \_\_\_\_\_

Amount attributable to conduct of Dr. Alan Dudley Labor: \$ \_\_\_\_\_

Amount attributable to conduct of Dr. Herman Anderson: \$ \_\_\_\_\_

Amount attributable to conduct of Officer Salvador Diaz: \$ \_\_\_\_\_

Total: \$ \_\_\_\_\_

**If you answered "No" to all of the four subparts in Question 2, please proceed to the signature line below.**

**If you answered "Yes" to any of the four subparts in Question 2, please proceed to Question 5(a).**

**Question 5(a):**

Has Plaintiff demonstrated, by a preponderance of the evidence, that she suffered compensatory damages as a result of being subjected to a violation of her due process rights?

Yes \_\_\_\_\_ No \_\_\_\_\_

**If you answered "No", please proceed to Question 5(b).**

**If you answered "Yes", please proceed to Question 5(c).**

**Question 5(b):**

What amount of nominal damages, not to exceed one dollar, do you award Plaintiff on her violation of due process claim?

\$ \_\_\_\_\_

**Please proceed to Question 6.**

**Question 5(c)**

State the total dollar amount of the compensatory damages that you find Plaintiff is entitled to for the violation of her due process rights, including the specific amount attributable to each Defendant to which you answered "Yes" in Question 2 above:

Amount attributable to conduct of Dr. Elisabeth Lescouflair: \$ \_\_\_\_\_

Amount attributable to conduct of Dr. Zana Dobroski: \$ \_\_\_\_\_

Amount attributable to conduct of Dr. Alan Dudley Labor: \$ \_\_\_\_\_

Amount attributable to conduct of Dr. Herman Anderson: \$ \_\_\_\_\_

Total: \$ \_\_\_\_\_

**Please proceed to Question 6.**

**Question 6:**

Has Plaintiff demonstrated, by a preponderance of the evidence, that she suffered punitive damages as a result of the violation of her due process rights?

Yes \_\_\_\_\_ No \_\_\_\_\_

**If you answered "No", please proceed to the signature line below.**

**If you answered "Yes", please proceed to Question 6(a).**

**Question 6(a)**

State the total dollar amount of the punitive damages that you find Plaintiff is entitled to for the violation of her due process rights, including the specific amount attributable to each Defendant to which you answered "Yes" in Question 2 above:

Amount attributable to conduct of Dr. Elisabeth Lescouflair: \$ \_\_\_\_\_

Amount attributable to conduct of Dr. Zana Dobroschi: \$ \_\_\_\_\_

Amount attributable to conduct of Dr. Alan Dudley Labor: \$ \_\_\_\_\_

Amount attributable to conduct of Dr. Herman Anderson: \$ \_\_\_\_\_

Total: \$ \_\_\_\_\_

**You have completed all questions. Please proceed to the signature line below.**

## SIGNATURE LINE

Foreperson and other jurors, please sign and date the verdict sheet. Then, without disclosing your verdict, advise the Court in a note that you have reached a verdict and are ready to return to the courtroom to announce your verdict.

Joseph T. Pappas  
Foreperson

Ch A. Sullivan

Ed De

[Signature]

Jerome Rella

Virginia Pubaris

Diana L. Martell

[Signature]

Dated:

2/13/2019